

# **Exhibit N**

**DECLARATION OF APRIL MEGGS**

I, April Meggs, pursuant to 28 U.S.C. § 1746, do hereby swear and affirm under penalty of perjury as follows:

1. The facts stated in this Declaration are true and correct and are based on my personal knowledge. I am over eighteen years of age and under no legal disability. I am providing this statement voluntarily without any threat or promise of reward having been made to me.
2. My name is April Meggs. I currently serve as the Vice President of Operations for MHM Health Professionals, LLC (MHMHP).
3. I began serving as the Vice President of Operations in 2017, and I have worked in management in some capacity since 2015.
4. My job duties and responsibilities include managing MHMHP's Health Services Administrators who work at prisons across the state of Mississippi, including Marshall County Correctional Facility (MCCF).
5. I served as Vice President of Operations during most of Dr. Amy Woods's employment.
6. In order to be hired and continue working for MHMHP, an employee must be able to enter the facility at which they work.

7. The security clearance at Marshall County Correctional Facility is controlled by Management & Training Corporation. Specifically, the warden controls who can enter and exit the prison.

8. I was involved in Dr. Woods's employment termination.

9. Dr. Wood's employment was terminated because she did not possess security clearance necessary for entry into MCCF. This was the sole reason for her employment termination.

10. I was notified that Warden Jesse Williams revoked Dr. Woods's security clearance.

11. When an MHMHP employee's security clearance is revoked, I typically receive a call. Afterwards, the Health Services Administrator or his or her assistant initiates a termination form.

12. The termination form is routed to me for approval.

13. After being notified that Dr. Woods's security clearance was revoked, I decided to wait a few days in order to make sure that Warden Williams did not reconsider his decision.

14. Warden Williams did not reconsider his decision to revoke Dr. Woods's security clearance.

15. After consulting with Kristie Huff, Human Resources, I decided to approve Dr. Woods's employment termination.

16. Dr. Woods never informed me that anyone asked or demanded that she stop sending prisoners outside MCCF for medical care.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 29 day of May, 2020.

  
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April Meggs